

THE PARTIES

4. Hardy is an African-American Illinois resident who was employed by MDP from on or about October of 1999 until June 1, 2001, when her employment was terminated by MDP.

5. MDP is an Illinois corporation whose principal place of business is located in Chicago, Illinois.

FACTS UNDERLYING HARDY'S LEGAL CLAIMS

6. Hardy was employed by MDP as an Administrative Assistant in its downtown Chicago headquarters.

7. Throughout the time she was employed by MDP, Hardy performed her job duties in a competent and professional manner. In in the performance evaluation Hardy received on January 19, 2001, she received a total score of 22 points, out of a maximum total score of 28 points, or 78.6 percent.

8. During 2000 and until her termination on June 1, 2001, Hardy was harassed and treated with disrespect by one of the MDP Associates for whom she worked. Also during that time, Hardy was the only African-American Administrative Assistant employed in that MDP office. Her mistreatment was so obvious that Hardy's co-workers commented on it and suggested that it was racially motivated.

9. Although Hardy complained to MDP management personnel about being mistreated in that manner, nothing was done to alleviate the problem.

10. On June 1, 2001, MDP informed Hardy that she was discharged, effective immediately. On information and belief, MDP replaced Hardy with a White employee.

11. MDP's decision to discharge Hardy was because of her race and/or because Hardy opposed MDP's racial discrimination against her with respect to the terms, conditions and privileges of her employment.

LEGAL CLAIM: SECTION 1981

12. MDP's discrimination against and discharge of Hardy because of her race impaired Hardy's right to make and enforce contracts on the same basis as is enjoyed by White citizens, in violation of Section 1981.

13. Hardy was injured by MDP's unlawful discrimination and by her unlawful discharge.

WHEREFORE, Hardy prays for entry of judgment in her favor and against MDP, and that she be awarded all appropriate relief available to her under Section 1981.

JURY DEMAND

Pursuant to Fed.R.Civ.P. 38(b), Hardy demands trial by jury of all matters appropriately tried by jury in this matter.

Respectfully submitted,

A handwritten signature in cursive script, reading "Frederick S. Rhine". The signature is written in dark ink and is positioned above a horizontal line.

One of the attorneys for the plaintiff

Terence J. Moran, Esq.
Frederick S. Rhine, Esq.
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Cap 2
UNITED STATES DISTRICT COURT,
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

DOCKETED

JUN 03 2003

CIVIL COVER SHEET

030 3721

I. Plaintiff(s): Romesa M. Hardy

Defendant: Madison Dearborn Partners, Inc.

County of Residence: Cook

County of Residence:

JUDGE CASTILLO

Plaintiff's Atty: Terence J. Moran, Esq.
Gessler Hughes Socol Piers
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Chicago, IL 60602
(312) 580-0100 general firm no.
(312) 604-2640 direct dial

Defendant's Atty:

MAGISTRATE SIDNEY I. SCHENKIER

II. Basis of Jurisdiction:

Federal Question (U.S. not a party)

III. Citizenship of Principal

Parties: (Diversity Cases Only)

Plaintiff:
Defendants:

IV. Origin:

Original Proceeding

V. Nature of Suit:

442 Civil Rights Employment

VI. Cause of Action:

Race Discrimination
42 U.S.C. § 1981)

VII. Requested in Complaint:

Class Action: No

Dollar Demand: To be determined

Jury Demand: Yes

VIII: This case **IS NOT** a refiling of a previously dismissed case.

Signature:

Frederick S. Rhine

Date:

May 30, 2003

U.S. DISTRICT COURT
JUN 03 2003
FILED-ED4

1-2

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

In the Matter of: **ROMESA M. HARDY v. MADISON DEARBORN PARTNERS, INC.**

ROCKETED
JUN 03 2003

Case Number:

03C 3721

APPEARANCES ARE HEREBY FILED BY THE UNDERSIGNED AS ATTORNEY(S) FOR:
ROMESA M. HARDY
JUDGE CASTILLO

MAGISTRATE SIDNEY I. SCHENKIER

(A)		(B)	
SIGNATURE <i>Terence J. Moran / FHR</i>	SIGNATURE <i>Frederick S. Rhine</i>		
NAME Terence J. Moran	NAME Frederick S. Rhine		
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IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 06185861	IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 06194079		
MEMBER OF TRIAL BAR? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	MEMBER OF TRIAL BAR? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		
TRIAL ATTORNEY? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	TRIAL ATTORNEY? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		
	DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		
(C)		(D)	
SIGNATURE	SIGNATURE		
NAME	NAME		
FIRM	FIRM		
STREET ADDRESS	STREET ADDRESS		
CITY/STATE/ZIP	CITY/STATE/ZIP		
TELEPHONE NUMBER	TELEPHONE NUMBER		
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